



SNS

CODE OF BUSINESS ETHICS

This Code applies to all employees. Compliance helps sustain and enhance good reputation and contributes to long term creation of added value for clientele. We believe that every employee plays their part in building and strengthening the group as a whole. We are committed to a non-retaliation, non-discriminatory policy. Any employee who in good faith reports any act of apparent misconduct or unethical behavior will not be victimized or treated adversely.

SNS Ltd, its employees and agents, are required, as a minimum, to comply with all International regulations and Flag State administrative requirements.

SNS Ltd expects employees to act with integrity at all times, in order to safeguard the trust laid upon us by customers, stakeholders, suppliers and any other interested parties (either individuals or organizations) with which our business interacts. This helps to protect the investment of shareholders.

No employee shall engage in personal activities or pursue personal financial or business gains and interests, which might give rise to, or give the appearance of, conflict of interest with the company, or which might compromise their ability to meet tasks requirements.

SNS Ltd shall not offer, promise, give, demand or accept bribes or pursue to gain any type of unethical advantage, in order to obtain, retain or hand over business.

Employees who have access to privileged information (including proprietary and confidential information, whether belonging to company or others) must not use it to achieve personal gain for themselves or others.

Employees must ensure proper and responsible use of all SNS Ltd assets, including physical property, intangible assets, and IT equipment and communication resources.

Company provides its customers with services, which meet or exceed their requirements, through the application of an effective QSMS and continuous improvement programs. These



provisions are designed to develop and apply innovative ideas, to respond quickly to changing customer demands and to improve services quality, while adding value for the client.

Employees must respect and treat within agreed terms all technological and intellectual property, as well as confidential information and any other assets or data received from customers and others.

Company expects agents and others working on its behalf to act lawfully and ethically and in accordance with the values and standards set out in this Code.

SNS Ltd upholds all internationally recognized human rights wherever its operations are located and adheres to all relevant international guidelines designed to ensure that weapons or other equipment are not used for the purpose of terrorism or abuse of human rights. In addition, company exercises a “zero tolerance” policy for any case of human rights’ violence and abuse.

SNS Ltd records all business transactions accurately, prudently and transparently, in compliance with social and corporate accounting policies and in accordance with best practices.

Comprehensive assessment and management of risk, along with certain internal control procedures, are essential aspects of company’s structure and serve to ensure that it is managed effectively and that reported results are accurate.

An independent Internal Audit function monitors and reports to company top management on the effectiveness of internal controls and on the ongoing risk management process for identifying, evaluating and managing significant business risk.

Top Management maintains overall responsibility for monitoring and reviewing effective implementation of this Code.